

# NENA

## The 9-1-1 Association

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Mr. Julius Knapp, Chief Engineer  
Office of Engineering and Technology  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

December 21<sup>st</sup>, 2012

Dear Mr. Knapp:

On behalf of NENA: The 9-1-1 Association, I write to again express NENA's belief that the development and deployment of advanced location technologies is critical to the future of emergency calling systems and public safety response capabilities. While NENA is not insensitive to the technical concerns of incumbent ISM-band users, and although we decline to specifically support Progeny's application or to comment on its test program or results, we do consider it important to support the Multilateration-Location and Monitoring Service ("M-LMS") generally. NENA notes, for instance, that despite many years of development and repeated requests for waivers of build-out requirements from M-LMS licensees, no M-LMS network has yet been deployed. Progeny's application and its deployment efforts thus far represent a commendable development in this regard. Additionally, Progeny has engaged with the Commission's Communications Security, Reliability, and Interoperability Council (CSRIC) to examine the viability and effectiveness of its proposed M-LMS network as a source of precise positioning information for locating 9-1-1 callers. NENA considers M-LMS one of many promising location technologies, and is closely monitoring the CSRIC process. NENA therefore urges the Office to consider the potential public safety implications of a nation-wide M-LMS network such as Progeny's proposed deployment as you conduct your evaluation of Progeny's waiver request.

Sincerely,



Telford E. Forgety, III, "Trey"  
*Director of Government Affairs  
& Regulatory Counsel*